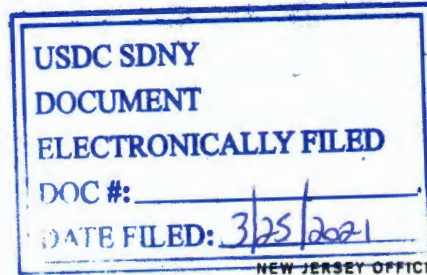


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MEMO ENDORSED

3/25/2021

March 19, 2021

Honorable Colleen McMahon  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Let him celebrate Easter with his family*  
*Am*

BY ECF

Re: United States v. James Cahill  
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully requests permission to travel to his son's home in Franklin Lakes, New Jersey on Easter Sunday, April 4, 2021, from the hours of 3:00 pm to 8:00 pm to celebrate Easter with his children and grandchildren. Only family members will be present at the gathering. His son's home is only twenty minutes from Cahill's residence and the exact address has already been provided to the government and Pretrial Services ("Pretrial"). The government, by Assistant United States Attorney Jason Swergold, consents to this application. Pretrial, by United States Pretrial Services Officer Andrew Abbott, does not consent pursuant to Pretrial's policy not to consent to travel for social reasons for defendants on home detention.

Thank you for Your Honor's consideration of this request.

Very truly yours,

*Sanford Talkin*  
Sanford Talkin

cc: AUSA Danielle Sassoon  
AUSA Jun Xiang  
SAUSA Laura de Oliveira  
USPTO Andrew Abbott